



OFFICE: (718) 878-3781 • FACSIMILE: (212) 748-1606 • INFO@TSIGLERLAW.COM • WWW.TSIGLERLAW.COM
299 BROADWAY, SUITE 1400, NEW YORK, NY, 10007

March 30, 2022

-Via ECF-

Chambers of Honorable Ronnie Abrams
Thurgood Marshall
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: Request to Remove Location Monitoring Device
Before Self-Surrender on April 4, 2022**

USA v. Sawtanter Dhaliwal
Case number: 1:20-cr-00579-RA

Dear Hon. Judge Abrams:

Our office represents Mr. Dhaliwal in the above-referenced matter. Mr. Dhaliwal We respectfully request that Your Honor permit Pretrial Services (“Pretrial” or “PTS”) to remove the location monitoring device (“LMD” or “GPS ankle bracelet”) on Friday April 1, 2022 or a date before the defendant’s surrender to the Federal Bureau of Prisons (“BOP”) scheduled on April 4, 2022.

Background

On February 4, 2022, Mr. Dhaliwal was adjudicated guilty of the offense of Aggravated Identity Theft in violation of 18 U.S.C. § 1028A (a)(1)/A(b). *See* Judgment in a Criminal Case, ECF Doc. 51 at 1. Your Honor ordered that he be committed to the Federal Bureau of Prisons (“BOP”) for a total term of 24 months, allowing him to self-surrender at an institution designated by BOP on or before April 4, 2022.¹ *Id.* at 2.

BOP has designated that Mr. Dhaliwal report to FCI Allenwood Medium, on or before April 4, 2022. After having contacted the Administration Unit of that facility, we were informed that it has no means or mechanism of removing the LMD “other than cutting it off.” Doing so would render the device useless. Mr. Dhaliwal is tasked with returning the equipment to Pretrial Services and is financially responsible for the cost of the LMD if he fails to do so.

¹ In addition, payment of restitution in the amount of \$182,000.00 was ordered. *Id.* at 6.

Honorable Ronnie Abrams
USA v. Sawtanter Dhaliwal, 1:20-cr-00579-RA
Pg. 2

Before his plea and sentence, Dhaliwal had been arrested on October 21, 2020, and was released nearly 6 months later on April 27, 2021, on a \$150,000 unsecured bond co-signed by two FRPs with the following conditions: home detention enforced with location monitoring (approved to self-install equipment at direction of Pretrial); surrender passport(s) and no new applications; travel restricted to SDNY/EDNY; no contact with victims or witnesses; do not possess personal identification of others; do not open any new lines of credit; obtain and maintain employment approved by Pretrial Services; allow assessment for any third-party risks (if current business allows for access to the personal information of others than refrain from that business); comply with Immigration; do not possess any firearms, any weapons, or destructive devices, and pretrial supervision as directed. As of this writing Mr. Dhaliwal has been in compliance with all of these conditions.

Accordingly, we ask that Your Honor approve the request directing the Pretrial Services Office for the Southern District of New York to remove his location monitoring device, either at his home or the PTS Office, on Friday, April 1, 2022 or before April 4, 2022.

Thank you for your attention and consideration in this matter.

Respectfully Submitted,

LAW OFFICES OF ROBERT TSIGLER

/s/ Joseph Caldarera
Joseph Caldarera, Esq.

cc: AUSA Matthew King (via ECF, Matthew.King2@usdoj.gov)
Pretrial Services Officer Joshua Rothman (via email, Joshua_Rothman@nyspt.uscourts.gov)

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
March 31, 2022